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8 *Attorneys for Defendant Happy Hour Media Group, LLC*

9 UNITED STATES DISTRICT COURT

10 DISTRICT OF NEVADA

11
12 DIAMOND RESORTS INTERNATIONAL, INC., a)
Delaware corporation; DIAMOND RESORTS)
13 CORPORATION, a Maryland corporation;)
DIAMOND RESORTS U.S. COLLECTION)
14 DEVELOPMENT, LLC, a Delaware limited liability)
company; and DIAMOND RESORTS)
15 MANAGEMENT, INC., an Arizona corporation,)

16 Plaintiffs,)

17 vs.)

18 REED HEIN & ASSOCIATES, LLC, d/b/a)
TIMESHARE EXIT TEAM, a Washington limited)
19 liability company; BRANDON REED, an individual)
and citizen of the State of Washington; TREVOR)
20 HEIN, an individual and citizen of Canada;)
THOMAS PARENTEAU, an individual and citizen)
21 of the State of Washington; HAPPY HOUR MEDIA)
GROUP, LLC, a Washington limited liability)
22 company; MITCHELL REED SUSSMAN, ESQ.)
d/b/a THE LAW OFFICES OF MITCHELL REED)
23 SUSSMAN & ASSOCIATES, an individual citizen)
of the State of California; SCHROETER,)
24 GOLDMARK & BENDER, P.S. A Washington)
professional services corporation; and KEN B.)
25 PRIVETT, ESQ., a citizen of Oklahoma,)

26 Defendants.)
27
28

Case No.: 2:17-cv-03007-APG-VCF

**STIPULATION AND ORDER TO
EXTEND TIME TO FILE
ANSWER TO AMENDED
COMPLAINT [ECF NO. 59]**

**STIPULATION AND ORDER TO EXTEND TIME TO FILE ANSWER
TO AMENDED COMPLAINT [ECF NO. 59]**

Pursuant to Local Rules 6-1 and 7-1, Plaintiffs DIAMOND RESORTS INTERNATIONAL, INC.; DIAMOND RESORTS CORPORATION; DIAMOND RESORTS U.S. COLLECTION DEVELOPMENT, LLC; and DIAMOND RESORTS MANAGEMENT, INC., (“Plaintiffs”), and Defendant HAPPY HOUR MEDIA GROUP, LLC (“Defendant Happy Hour”), by and through their respective attorneys of record, stipulate as follows:

STIPULATION

1. Plaintiffs filed their Amended Complaint for Damages and Injunctive Relief (“Amended Complaint”) on January 4, 2019 [ECF No. 59] which added several new defendants including Happy Hour.
2. The Amended Complaint is 50 pages long with 232 separate paragraphs of allegations and includes 5 causes of action against Happy Hour. The Amended Complaint in this case involves complex business tort, unfair business practices, and false advertising.
3. Happy Hour was served with the summons and Amended Complaint on January 10, 2019.
4. The Defendant Happy Hour requests an extension to allow them to fully review and respond to the allegations in the Amended Complaint.
5. Additionally, an extension will promote judicial economy as it will allow the Defendant Happy Hour to determine whether a single response or separate responses to the complaint will be necessary.
6. Defendant Happy Hour requests an extension until February 28, 2019 to file its response to the Amended Complaint.
7. Plaintiffs’ do not oppose the extension.
8. This stipulation is not made for purposes of delay.
9. Furthermore, because other new parties are being added to the litigation, any extension will have minimal impact on timing as those parties will need to be served and respond to the complaint as well.

10. Therefore, the parties agree that Defendant Happy Hour's respective responses to the Amended Complaint are now due on or before February 28, 2019.

DATED: February 4, 2019.

DATED: February 4, 2019.

GORDON REES SCULLY MANSUKHANI, LLP

SHUTTS & BOWEN LLP

/s/ Robert S. Larsen

/s/ Daniel J. Barsky

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ORDER

IT IS SO ORDERED.



UNITED STATES MAGISTRATE JUDGE

DATED: 2-5-2019